DAVID M. MICHAEL, SBN #74031 1 LAW OFFICES OF DAVID M. MICHAEL 2 414 Gough Street, Suite 2 San Francisco, CA 94102 3 Telephone: (415) 621-4500 Facsimile: (877) 538-6220 4 **Attorney for Plaintiff** 5 PAUL L. FIELDS, Jr. 6 UNITED STATES DISTRICT COURT 7 8 9 UNITED STATES OF AMERICA. 10 Plaintiff. V. 11 \$25,000 IN UNITED STATES 12 CURRENCY. 13 Defendant. PAUL L. FIELDS, Jr. 14 Claimant. 15

NORTHERN DISTRICT OF CALIFORNIA

CASE NO: C 04 0430 SC

STIPULATION AND (PROPOSED) ORDER FOR CONTINUANCE OF STATUS CONFERENCE DATE AND **HEARING DATE ON PRETRIAL** MOTIONS

This case is presently set for a status conference and a hearing on pretrial motions on 1 December 2006 at 10:00 a.m.

The parties are still unable to provide the Court with their pleadings regarding this scheduled hearing date due to the fact that discovery still remains to be completed. To date the government has provided Claimant with approximately 50-80 pages of document compliance but, due to the difficulty in locating certain files, is still in the process of completing its further compliance with interrogatory requests and other documents that may be discovered. Until such discovery is completed and the requested information provided, Claimant is unable to prepare and file his pretrial motions.

Based on the above and as per the parties' discussions with the Court, it is stipulated and agreed that this matter be continued as follows:

STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF STATUS CONFERENCE DATE AND HEARING DATE ON PRETRIAL MOTIONS CASE NO: C 04 0430 SC

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1. That the Court vacate the present date for status and hearing on pretrial motions and that the status conference and hearing date on pretrial motions be continued to 9 February 2007, at 10:00 a.m.

WHEREFORE, it is hereby stipulated by and between the parties that the the status conference and hearing date on pretrial motions be continued to 9 February 2007, at 10:00 a.m.

Dated: 15 November 2006

Respectfully submitted,

DAVID M. MICHAEL Attorney for Claimant PAUL L. FIELDS, Jr.

Dated: 15 November 2006

AUSA STEPHANIE HINDS

Attorney for Plaintiff

UNITED STATES OF AMERICA

[PROPOSED] ORDER

Pursuant to the stipulation of the parties, and for good cause having been shown,

IT IS HEREBY ORDERED that the present status and hearing date on pretrial motions is vacated and the status conference and hearing date on pretrial motions shall be continued to 9 February 2007, at 10:00 a.m.

DATED: 11/21/06



STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF STATUS CONTERED AND HEARING DATE ON PRETRIAL MOTIONS

CASE NO: C 04 0430 SC